



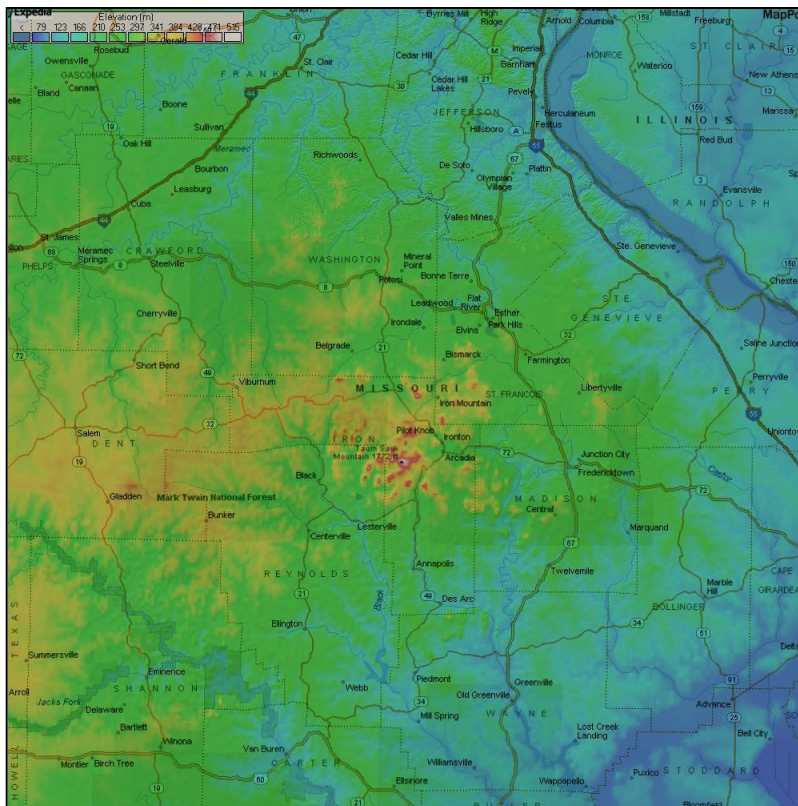
My name is Victoria Proffer, I am the CEO of St. Louis Broadband, LLC, <http://stlouisbroadband.com>

First, a bit about my background. I built the first dial-up network for our proposed fixed wireless coverage area, so I have been an ISP for sixteen years, I have been involved in fixed wireless for ten of those years and own and operate St. Louis Broadband, a fixed wireless service provider in the metro St. Louis area for the last six years.

St. Louis Broadband provides services to businesses in the Westport area. We provide service to small businesses and are their technical partner, as well as large businesses where we back-up their wired services.

As a member of WISPA <http://WISPA.org> and a WISPA Legislative Committee I have worked answering the questions that NTIA has sent out. However, as a WISP I have been actively involved in developing a plan for my community.

St. Louis Broadband has been looking at a project that we have named ShowMe Broadband, <http://showmebroadband.com>. We have been working on this project for the past two years.



Proposed Coverage Area

There are several pockets, in the twelve county area, of residential homes that range from 500 to 2500 population that are totally unserved. As well as there are the same pockets that are underserved with only one provider.

We have talked to community leaders, colleges, hospitals, home owners association, as well as recently the state of Missouri regarding our project.

Because of envisioning this project two years ago in some locations we are currently “shovel ready” and ready to start construction today. However the State recently spoke of possible “right of ways” for tower location in exchange for broadband services to State locations like prisons, court houses, etc. These areas still need to be examined for possible use.

One of St. Louis Broadband’s customers is the American Red Cross. We have been providing them service over the past five years, as well as technical support. One thing that we have been discussing during this time frame is our geological area and how dangerous it can be.

I feel that our project is one of the most important in the state of Missouri, if not in the nation. Our location is in the southeast portion of Missouri. This location has some interesting and challenging features due to the Precambrian geology. This area also hosts the New Madrid fault zone.

In some of the counties that we are proposing our fixed wireless solution, they are just now starting to install 911 services, I know of one county that there is no 911 service at all. Also another factor that makes this situation more vulnerable is because most of these counties, due to their rich ore where a part of a chain of mines, there are mazes of honeycombs that whole communities sit on.

“THE HIGHEST EARTHQUAKE RISK in the UNITED STATES outside the West Coast is along the New Madrid Fault. Damaging tremors are not as frequent as in California, but when they occur, the destruction covers over more than 20 times the area because of underlying geology.

A DAMAGING EARTHQUAKE in this AREA, 6.0 or greater, occur about every 80 years (the last one in 1895). The results would cause serious damage to schools and masonry buildings from Memphis to St Louis.” <http://www.scchealth.org/docs/ems/docs/prepare/newMadrid.html>

As one can see from the above statement we are way past our deadline for this quake. Doubled in with the fact of communities sitting on top of this honeycomb of mines, it is a disaster waiting to happen. Add in the fact that these communities have little or no communications, it makes this another Katrina or worse in our midst.

St. Louis Broadband has designed a network with a triple fiber redundancy from different National Access Points, in the event that we could lose fiber connectivity, as well as we have added redundant satellite feeds. The tower network itself has a “self healing” distribution ring. We are limiting the use of guyed towers and opting for self-supporting towers for “earthquake precaution”.

Because of these towers being in great locations for wind in the fall/winter and solar in the spring/summer, rather than installing diesel powered generators for backup we have added solar and wind devices. We have also added a 4.9 GHz network for First Responders. We want all counties in our network to have access to this, we feel that this is very important.

We also feel it is important to include telemedicine programs, as well as distance learning. This network will be fully capable of supporting both.

What do we need from NTIA to provide this?

- Make emergency infrastructure a priority. While we understand the importance of bringing broadband to rural areas we feel that the loss of potential life is priority. These applications above all should receive first consideration.
- Keep it simple. While we recognize that certain information needs to be provided to disburse ARRA monies, don't make the project unattainable because of complicated studies or too much government involvement.
- Let the States be involved. We realize that distributing the funds directly to the States is not what Congress intended. We also understand that this would add another layer of government that is not necessary. However we also realize that State involvement is crucial to understand the resources and support services that can be utilized. We feel that the States should support the applicable grants and be kept fully aware of the process, as well as the construction phases of each network.
- Flexibility. When designing a network of this magnitude, sometimes one runs into trouble. While it is easy to calculate the nuts and the bolts, building in the two year time frame may require slight changes of plans, such as weather, easement issues, vendor issues, labor issues, etc. Let the States be involved in monthly project meetings where these changes could be discussed and approved. Let the States be the NTIA local authority.
- Complete Funding. When projects offer multiple goals of the ARRA Grant directives, allow complete funding of projects rather than the 20% commitment. My personal feeling is that we are going to see the "Pioneers of Broadband" involved in this project. These are the guys and gals that developed the fixed wireless solution. These are not the AT&T nor Verizon companies. These "Pioneers" have put up their homes to build their networks, risked everything to make this technology available for the masses. These companies compete daily with the ILECs who receive federal funding. These are the same ILECS that have "cherry picked" their networks and have put this country into the current situation it is in, with limited broadband access. We believe that companies that have received past federal funding should be exempt from this grant. These funds should also be available to draw upon immediately once a grant has been awarded. It is the guys that are operating the companies with less than \$1 million in annual revenue that are going to build the American Broadband Backbone. These are the more "bang for the buck" guys, because they have had to be, nothing has been handed to them or easy for them, and I do speak from experience. These guys are true Americans that work hard for a living to bring the technology of fixed wireless to America.
- Give small and economically challenged businesses a break. We are a woman owned business, as well as Viet Nam veteran run and owned. To establish a SBA 8(a) certification it not only takes a great deal of time, but of money as well. Either use the self-certification set by the SBA for WOSB or streamline the SBA 8(a) certification process. These businesses should receive at least a 5% priority.

I hope the views of our company has helped and I hope to see the NTIA do what is right for America in this crucial time.

Let our grandchildren know in the years to come that you made the right decision today.

Sincerely,

Victoria Proffer CEO – St. Louis Broadband

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